

### REMARKS

Claims 1-6, 17, 20, 21, 23 and 24 remain rejected as unpatentable over *Razin* (US 6,125,377) in view of *Felt* (US 6,092,092). The Applicants respectfully traverse this rejection.

#### Reply to Examiner's "Response to Arguments"

The Applicants through their undersigned attorney have carefully considered the Examiner's response in paragraph 4 of the last Office Action, but must respectfully disagree with the Examiner's understanding of *Razin*. The Examiner there asserts that the Interpretation Rules Base of *Razin* actually sets a predetermined maximum formatting length, not a minimum as the Applicants stated. The Examiner also asserts that a formatting run (according to *Razin*) may be indicative of a title if the text meets the criteria of being **less than** or equal to four words, citing column 6, lines 1-5 of *Razin*. (a "formatting run", as disclosed and claimed by the Applicants, is the smallest section of text within the document having the same formatting attributes.)

However, the cited passage in *Razin* refers not to a formatting run, but instead to a Rule in *Razin's* Parsing Rules Base. That particular rule defines the length of text on the first page of a document, and before any paragraph break, sufficiently short to be potentially indicative of a title. Thus, that particular Parsing Rule looks for text length equal to or less than four words, on the first page, and before any paragraph break. If any text asserts that attribute, *Razin's* Parsing Rules Database looks for other attributes of the text, mainly, Bolding and Underlying, Capitalization Attributes, and Justification Attributes (column 6, lines 5-11). If the text meets all those attributes, that text meets *one test* imposed by *Razin*, namely, "Document Parsing".

Comparing that discussion in *Razin* to the present Claim 1, please note that nothing in that portion of *Razin* teaches a "formatting run [that] is the smallest section of text within the document having the same formatting attributes", as required by the system of Claim 1. *Razin's* particular Parsing Rule looks for text possessing a predetermined collection of attributes, namely, text length, formatting attributes, capitalization attributes and justification attributes. If the text under examination contains fewer than all those attributes, the Parsing Rules of *Razin* does not recognize that text (even if text length  $\leq 4$  words, in the specific example). The present invention, however, identifies as a formatting run the smallest section of text having the same formatting attributes, whether or not that section of text also meets certain Parsing Rules or other criteria. (As the example of Applicants' Fig. 4a demonstrates, the smallest section of text having the same *combined* formatting attributes may constitute a separate formatting run from formatting runs having only a single formatting attribute.)

As mentioned above, the Examiner's observation about text length being less than or equal to four words applies only to one of several attributes required by *Razin's* Parsing Rules Base to define a title. More importantly, Parsing is but one step in the overall system taught by *Razin*. Other steps include "Unknown Element Interpretation" (column 3, lines 42-52), "Creation of Known Elements" (column 3, lines 53-61), "Significant Style Counts" (column 3, line 62-column 4, line 4), "Linkage of Related Known Elements" (column 4, lines 5-12), and "Comparison of Known Elements" (column 4, lines 13-27). The first step, Unknown Element Parsing, looks to a predetermined rules database (the "Parsing Rules Base") and parses text to determine its attributes." *Razin* teaches that "only those units of text meeting a sufficient number of the

criteria required by this rules base are deemed candidate Unknown Elements..." for additional analysis and interpretation according the second step. Please see column 3, lines 38-41 (emphasis added).

Based on this explicit statement by *Razin*, the Applicants respectfully submit that *Razin* does indeed teach that only units of text meeting a sufficient number of predetermined criteria should undergo the additional analysis and interpretation taught by that reference. This teaching is in direct contradistinction to the present invention as defined in Claims 1 et al, wherein the formatting run "is the smallest section of text within the document having the same formatting attributes". That teaching simply does not exist in *Razin*. Singling out one attribute (text length equal to or less than four words) in isolation from the disclosed Parsing Rule requiring certain additional attributes to identify a possible title, would not lead one of ordinary skill to disregard *Razin's* explicit teaching that only units of text "meeting a sufficient number of the criteria required by [his] rules base" deserve additional analysis and interpretation. Such selective interpretation amounts to a hindsight reconstruction of *Razin* based on the applicants' own teachings.

For the foregoing reasons, the Applicants submit that Claims 1 et al. would not have been obvious in view of *Razin*, whether or not considered with *Felt*.

Furthermore, even assuming arguendo the combination of *Razin* in view of *Felt*, the Applicants respectfully submit the combination would not have directed one of ordinary skill to a combination including the limitations of Claim 1. *Razin*, as pointed out above, requires identifying units of text meeting at least a sufficient number of the criteria required by a rules base. Nothing in that primary reference teaches or suggests a

formatting run as the smallest section of text within the document having the same formatting attributes. *Felt* would have taught, at the most, a particular way for identifying attributes according to *Razin*, namely, a particular way for identifying only those units of text meeting a sufficient number of the criteria required by a Parsing Rules Base as taught by *Razin*. The resulting combination of *Razin* and *Felt* would not, however, teach one of ordinary skill that a formatting run in the overall claimed combination is the smallest section of text within the document having the same formatting attributes. Absent the teachings of the present Applicants, that limitation would have remained unknown to one of ordinary skill in view of the applied art. Accordingly, Claims 1 et al. are patentable over *Razin* and *Felt* for this further reason.

Independent Claims 16 and 17 each contain the same limitation discussed above with respect to Claim 1, namely, defining a formatting run as comprising the smallest section of text with the document having the same formatting attributes. Each of those claims and the claims depending therefrom are, accordingly, not taught or suggested by *Razin* in view of *Felt*, whether or not taken in further view of the other applied secondary references.

Claim 7-12 and 19 stand rejected as unpatentable over *Razin* in view of *Newbold* (US 5,576,955). *Felt* is not included in the rejection of those claims, each of which incorporates the limitations of a parent claim containing the aforementioned formatting-run limitation. Accordingly, the Applicants respectfully traverse that rejection for the reasons set forth above with respect to *Razin*. *Newbold* does not teach the Applicants' limitations with respect to the formatting run, and was not cited for that purpose.

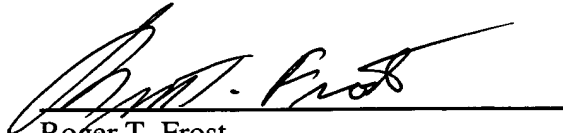
Claims 13-15 stand rejected as unpatentable over *Razin* in view of *Fein* (US 6,088,711). These claims likewise incorporate limitations of their respective parents, including the formatting-run limitation discussed above. *Fein* is not cited as teaching that limitation and does not teach that limitation. The Applicants, accordingly, traverse the rejection for the reasons discussed above with respect to *Razin*.

Claims 16 and 18 are rejected as unpatentable over *Razin* in view of *Felt*, *Newbold*, and *Fein*. The Applicants respectfully traverse this rejection for the reasons set forth above with respect to *Razin*, and to the proposed combination of *Razin* in view of *Felt*.

The foregoing is submitted as a complete response to the Office Action identified above. The Applicants respectfully submit that all claims of the present application define patentable subject matter over the applied art and solicit a Notice of Allowance for the claims.

Respectfully submitted,

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